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13 *Christopher Terry, and Isis Terry*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

15 FEDERAL TRADE COMMISSION; and  
16 STATE OF NEVADA,  
Plaintiffs

17 v.

18 INTERNATIONAL MARKETS LIVE INC.,  
a corporation, also d/b/a IYOVIA,  
19 iMarketsLive, IM Mastery Academy, and IM  
Academy; IM MASTERY ACADEMY  
20 LTD., f/k/a International Markets Live Ltd., a  
United Kingdom company; ASSIDUOUS,  
21 INC., a corporation; GLOBAL DYNASTY  
NETWORK, LLC., a limited liability  
22 company; CHRISTOPHER TERRY,  
individually and as an owner and officer of  
23 International Markets Live Inc.; ISIS  
TERRY, fka ISIS DE LA TORRE,  
24 individually and as an owner and officer of  
International Markets Live Inc., IM Mastery  
25 Academy Ltd., and Assiduous, Inc.; JASON  
BROWN, individually and as an officer of  
26 International Markets Live Inc. and as a  
member of Global Dynasty Network, LLC;  
27 ALEX MORTON, individually and as an  
officer of International Markets Live Inc.;

Case No.: 2:25-cv-00760-CDS-NJK

**STIPULATION AND ORDER  
EXTENDING DEADLINE TO RESPOND  
AND REPLY TO MOTION FOR  
PRELIMINARY INJUNCTION  
(FIRST REQUEST)**

[ECF No. 47]

MATTHEW ROSA, individually and as a  
member of Global Dynasty Network, LLC;  
and BRANDON BOYD,

Defendants

Plaintiffs FEDERAL TRADE COMMISSION and STATE OF NEVADA (collectively,  
as the “Plaintiffs”) and Defendants INTERNATIONAL MARKETS LIVE INC., IM  
MASTERY ACADEMY LTD., ASSIDUOUS, INC., CHRISTOPHER TERRY, and ISIS TERRY,  
together with Defendants GLOBAL DYNASTY NETWORK, LLC, JASON BROWN,  
ALEX MORTON, MATTHEW ROSA, and BRANDON BOYD (collectively, as the  
“Defendants”) (Plaintiffs and Defendants collectively as the “Parties” and each a “Party), by  
and through their respective undersigned counsel of record, hereby respectfully submit this  
*Stipulation and Order Extending Deadline to Respond and Reply to Motion for Preliminary*  
*Injunction* (the “Stipulation”) and stipulate and agree to a fourteen (14)-day extension of the  
current response deadline (from June 13, 2025 to June 27, 2025) with a corresponding seven  
(7)-day extension to the reply deadline for Plaintiffs’ *Motion for Preliminary Injunction*, dated  
May 30, 2025 (the “Motion”; ECF No. 42), which is the first requested extension thereto, as  
follows:

1. On May 30, 2025, Plaintiffs filed their *Motion for Preliminary Injunction* (the  
“Motion”; ECF No. 42).

2. Responses to the Motion are currently due by June 13, 2025, thereby making  
replies due by June 20, 2025.

3. Plaintiffs’ Motion seeks a preliminary injunction against the four corporate  
defendants<sup>1</sup> and the six individually named defendants<sup>2</sup> “that enjoins Defendants’ unlawful  
conduct, preserves Defendants’ assets, and appoints a monitor over Corporate Defendants, which  
have operated as a common enterprise” (ECF No. 42 at 10), and is accompanied by a seven-part

<sup>1</sup> (ECF No. 42-1 at 5) (“**Corporate Defendants**’ means International Markets Live, Inc., also d/b/a IYOVIA, iMarketsLive, IM Mastery Academy, and IM Academy; IM Mastery Academy Ltd., f/k/a International Markets Live Ltd.; Assiduous, Inc., Global Dynasty Network, LLC, and their affiliates, subsidiaries, successors and assigns.”).

<sup>2</sup> (ECF No. 42-1 at 6) (“**Individual Defendants**’ means Christopher Terry, a/k/a Chris Terry, Isis Terry, f/k/a Isis De La Torre, Jason Brown, Alex Morton, Matthew Rosa, and Brandon Boyd.”).

1 proposed preliminary injunction (ECF No. 42-1–42-7) and 25 exhibits, totaling 6928 pages (ECF  
2 No. 42-8–42-48) and including 12 videos (ECF No. 43).

3 4. Defendants’ good faith estimate is that a minimum 90-day extension to the  
4 response deadline is reasonably necessary to fully respond to Plaintiffs’ Motion given the nature of  
5 Motion, the scope and broad/far reaching extent of the injunctive relief sought, and the sheer volume  
6 of the exhibits—which includes a 564-page expert report (ECF No. 42-23). Briefing on a motion  
7 for preliminary injunction inherently necessitates a “sneak peak” of the allegations and claims  
8 asserted in the complaint on the merits—which, here, involves a 70-page Complaint alleging ten  
9 (10) counts against four (4) corporate defendants and six (6) individual defendants based on the  
10 Federal Trade Commission Act, Telemarketing and Consumer Fraud and Abuse Prevention Act,  
11 and the Restore Online Shoppers’ Confidence Act, as well as NRS Chapter 598. Further,  
12 Defendants will need adequate time to obtain and present sufficient evidentiary support to rebut not  
13 only the 564-page expert report, but the various statements and assertions made by 20 declarants,  
14 which include a forensic accountant and a data analyst.

15 5. The Parties have exchanged their respective views and positions on the time and  
16 effort reasonably necessary to respond and reply to the Motion, but had fundamentally differing  
17 opinions.

18 6. As a result, the Parties agreed to a compromise whereby the response deadline  
19 would be extended fourteen (14) days (June 13, 2025 to June 27, 2025), along with a corresponding  
20 seven (7)-day extension to the reply deadline to July 11, 2025), and further extension would be  
21 sought by motion on a shortened briefing schedule.

22 7. Accordingly, the Parties hereby agree and stipulate, and jointly move for entry of  
23 an order so approving, as follows:

- 24 a. The current deadline to file responses to the Motion (ECF No. 42) is extended  
25 fourteen (14) days, from June 13, 2025 to **June 27, 2025**.
- 26 b. The reply deadline will be extended a corresponding seven (7) days, to **July**  
27 **11, 2025**.
- 28 c. A shortened briefing schedule will govern any subsequent motions to extend

the response/reply deadlines set forth herein. Responses will be due within **6 days** after the filing of such motion and replies will be due within **2 days** thereafter.

8. This Stipulation is made in good faith, not for purposes of undue delay, supported by good cause, and made without prejudice to any Party's ability to move the Court for further extensions for good cause if needed.

IT IS SO STIPULATED.

DATED this 6th day of June 2025.

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FEDERAL TRADE COMMISSION

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/s/ Laura C. Basford

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*Federal Trade Commission et al. v. International Markets Live, Inc. et al.*

Case No. 2:25-cv-00760-CDS-NJK

Order Extending Deadline to Respond and Reply to Motion for Preliminary Injunction (First Request)

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

Dated: June 11, 2025

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